

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
No. 7:23-CV-897

IN RE: )  
 )  
CAMP LEJEUNE WATER LITIGATION )  
 )  
This Document Relates to: )  
ALL CASES )  
\_\_\_\_\_ )

**PLAINTIFFS' NOTICE OF RULE 30(b)(1) INDIVIDUAL DEPOSITION NOTICE**  
**DE BENE ESSE**

TO: Defendant United States of America  
c/o Adam Bain, U.S. Department of Justice  
P.O. Box 340, Ben Franklin Station  
Washington, D.C. 20044

**PLEASE TAKE NOTICE** that pursuant to Federal Rules of Civil Procedure 30(b)(1) and 26, the stenographic and video-recorded *de bene esse* deposition of the following witness will be taken as set forth below, and thereafter by adjournment until the same shall be completed:

**WITNESS:** Dennis Portier  
**DATE and TIME:** May 28, 2024 at a time to be determined.  
**LOCATION:** Domodossola, Italy at a location to be determined.  
**MANNER OF TAKING:** In-Person

This deposition will be taken before an officer authorized by law to take depositions and will continue from day to day until completed. The deposition will be recorded via stenographic transcription and videotape for purposes of discovery and use at trial.

Deponent(s) who are parties, are required by this notice to be present for their depositions. The deponent agreed to appear in person.

You are invited to attend and take such part as is fit and proper.

Respectfully submitted this 10th day of May 2024.

/s/ J. Edward Bell, III

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*Co-Lead Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Notice of Videotaped Deposition to General Anthony Zinni was sent to Counsel for Defendant on the 10th day of May 2024, by electronic mail at the following electronic mail address: adam.bain@usdoj.gov.

/s/ J. Edward Bell, III

J. Edward Bell, III

*Lead Counsel for Plaintiffs*